

Appendix 3

Draft Shopfronts Supplementary Planning Document (SPD3) Equality Analysis

Screening Data

1. What are the objectives and expected outcomes of your proposal? Why is it needed? Make sure you highlight any proposed changes.

The Shopfronts Supplementary Planning Document (SPD3) will when adopted replace an existing Shopfronts and Shop Signs Supplementary Planning Guidance (SPG7) which was adopted in 2003. This document sets urban design principles and advice that will ensure that the quality of built development that comes forward in the Borough is improved. It is supplementary to planning policies in the 2010 Brent Core Strategy, plus other policies within the Brent Local Plan and the London Plan.

The overarching objectives of the SPD are:

- a) To support the re-development and re-use of shops, creating a good environment for new and existing residents and businesses; and
- b) The expectation that developers will demonstrate how their proposals make a positive design contribution to the Borough as a whole and relate well to the surrounding area.

2. Who is affected by the proposal? Consider residents, staff and external stakeholders.

The proposal will impact on local residents and local businesses. The SPD will be applicable across the whole Borough. As such the population characteristics are:

Roughly 50/50 male/female population split.

The population has a white British representation at 16.4%, Asian/Asian British (Indian Sub-continent) at 23.8% and a Black/African/Caribbean/African British population split at 18.8%.

In terms of disability 14.5% of the population have their day to day activities limited by health issues.

In terms of religion 41.5% are Christian, 18.6% are Muslim and 17.8% are Hindu in Brent.

In terms of the age of the population, Brent has 24.9% of the population as younger people (under 20) whilst over 60s represent 14.5% of the population.

It is estimated that the Lesbian, Gay and Bi-sexual (LGB) population in Brent is between 15,561–21,785; 3112 people experience gender variance and 62 are transgender people.

3.1 Could the proposal impact on people in different ways because of their equality characteristics?

The SPD seeks to build on Local Plan policies that provide accessible development.

3.2 Could the proposal have a disproportionate impact on some equality groups? If you answered 'Yes' please indicate which equality characteristic(s) are impacted

It is not considered that the proposed developments will have a disproportionate adverse impact on groups with protected equality characteristics. More detail is set out below in Section 5.

3.3 Would the proposal change or remove services used by vulnerable groups of people?

No, neither directly or indirectly as a result of the SPD.

3.4 Does the proposal relate to an area with known inequalities?

The guidance relates to the Borough as a whole although with some particular relevance to town centres, which have some areas of high levels of deprivation as measured by the Indices of Multiple Deprivation.

3.5 Is the proposal likely to be sensitive or important for some people because of their equality characteristics?

As set out above, the guidance will be sensitive or important for some people because of their equality characteristics.

3.6 Does the proposal relate to one of Brent's equality objectives?

The SPD relates to a multiplicity of strategic priorities and equality and human rights objectives as set out in the Equalities Action Plan 2015. These include:

Supporting local enterprise, generating jobs for local people, helping people into work and promoting fair pay.

This will be delivered through an emphasis on providing high quality shops with well-designed shopfronts.

Making sure that our children and young people have access to the best education and training, achieve to their potential and have the best start in life.

This does not relate to the content of the SPD.

Enabling people to live healthier lives and reducing health inequalities.

This does not relate to the content of the SPD.

Making sure that Brent is an attractive place to live, with a pleasant, sustainable environment, clean streets and well-cared for parks and green spaces.

This one of the most significant elements of SPD, providing for a high quality, desirable place which people want to live in, work in and visit.

Continuing to reduce crime, especially violent crime, and making people feel safer.

The SPD will reduce the opportunities for crime by reducing empty properties and by providing places built along good urban design principles, including active frontage, providing the opportunity for increased passive surveillance of the public realm.

Increasing the supply of affordable, good quality housing.

The guide seeks to provide an efficient use of land, thus creating better opportunities for providing additional amounts of housing, including affordable housing.

Building community resilience and promoting citizenship.

This is being achieved through making the Borough a much more desirable place in which people want to live and stay, thus creating stable, rather than transient communities with little interest in their surroundings.

Making sure that everyone in the borough is able to participate in local democracy, has a fair say in the way that services are delivered, and is listened to and taken seriously.

The SPD was subject to a public consultation and this provided an opportunity for comment before it is adopted by Cabinet.

Recommend this EA for Full Analysis?

No

Analysis

5. What effects could your policy have on different equality groups and on cohesion and good relations?

5.1 Age (*select all that apply*)

- Positive
- Neutral
- Negative

Please give details: Providing safe, attractive and well-used buildings, especially within town centres and other places of congregation is important for community cohesion and provides the opportunity for various groups to use the same services, mingle and interact.

5.2 Disability (*select all that apply*)

- Positive
- Neutral
- Negative

Please give details:

Converting underused shops to ground floor residential use will provide for more convenient level access for disabled people and families with children in buggies and also for older people who might not be disabled but have issues related to accessibility currently. Improved level access to retail shopfronts will also have similar benefits.

5.3 Gender Identity (*select all that apply*)

- Positive
- Neutral
- Negative

Please give details:

There are not considered to be any specific gender identity issues related to the draft SPD.

5.4 Marriage and civil partnership (*select all that apply*)

- Positive
- Neutral
- Negative

Please give details:

There are not considered to be any specific marriage and civil partnership issues related to the draft SPD.

5.5 Pregnancy and maternity (*select all that apply*)

- Positive
- Neutral
- Negative

Please give details:

Converting underused shops to ground floor residential use will provide for more convenient level access for disabled people and families with children in buggies and also for older people who might not be disabled but have issues related to accessibility currently. Improved level access to retail shopfronts will also have similar benefits.

5.5 Race (select all that apply)

- Positive
- Neutral
- Negative

Please give details:

As identified the borough and its town centres have a high representation of BME groups. The regeneration of the area should be positive for these groups due to the improvements which will be made.

5.7 Religion or belief (select all that apply)

- Positive
- Neutral
- Negative

Please give details:

There are not considered to be any specific religion or belief issues related to the draft SPD.

5.8 Sex (select all that apply)

- Positive
- Neutral
- Negative

Please give details:

No significant differences has been identified in relation to sex aspects, other than those related to specific other characteristics, e.g. pregnancy and maternity.

5.9 Sexual orientation (select all that apply)

- Positive
- Neutral
- Negative

Please give details:

No significant impacts either negative or positive has been identified in relation to this characteristic.

6. Could any of the impacts you have identified be unlawful under the Equality Act 2010? Prohibited acts include direct and indirect discrimination, harassment, victimisation and failure to make a reasonable adjustment.

- Yes
- No

7. Please provide a brief summary of any research or engagement initiatives that have been carried out to formulate your proposal.

The SPD has taken and identified best practice in relation urban design guidance at a national and regional level. Feedback from public consultation has informed the final SPD and this analysis is updated as relevant.

What did you find out from consultation or data analysis?

Only a handful of responses have been received as a result of the public consultation. These did not relate to the needs of particular equality groups. As such, the consultation suggests that there are no significant equality implications.

Were the participants in any engagement initiatives representative of the people who will be affected by your proposal?

The consultation was public and open to all affected. As such the public consultation and its respondents are considered representative.

How did your findings and the wider evidence base inform the proposal?

Officers have a high appreciation of the impacts that guidance and planning policies can have on impacting on equalities and have sought for the guidance to be as positive as it can about promoting inclusive design.

8. What actions will you take to enhance the potential positive impacts that you have identified?

This will be followed through by planning officers in their consideration of planning applications and an attempt to ensure that equalities aspects are positively addressed through proposed developments.

9. What actions will you take to remove or reduce the potential negative impacts that you have identified?

Not applicable

10. Please explain how any remaining negative impacts can be justified?

Not applicable